

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

March 23, 2020

**SUBJECT:** Review Comments on GW Monitoring Report  
Regarding Hydro Extrusions USA, LLC in  
Cressona, PA

**FROM:** Barbara Smith, Hydrogeologist  
EPA, Region 3

**TO:** Scott Rice  
Toxics Programs & Enforcement  
EPA, Region 3

I reviewed the following Report, *December 2019 Annual Groundwater Monitoring Report*, by AECOM, dated February 2020, regarding the Hydro Extrusions USA, LLC Facility in Cressona, Schuylkill County, PA, and offer the following discussion and recommendations.

The Report's recommendations are in Section 4.2 and are also in the cover letter to the Report. The recommendations are: (1) change the frequency of monitoring DNAPL at six locations (one monitoring well and 5 piezometers) from quarterly to annually; and (2) continue monitoring PCBs in the 10 locations (5 monitoring wells and 5 piezometers) annually.

I reviewed the Report to see if the data provided supports the recommendations. I found that the data does support the recommendations, and I agree with them, however, I recommend reducing monitoring at this Facility even more, for the following reasons:

1. DNAPL sampling: According to a conversation I had with the AECOM geologist, Facility personnel collects DNAPL presence/absence measurements and depth to water (DTW) measurements from 26 locations (15 monitoring wells and 11 piezometers) annually. AECOM measures 6 of these locations for DNAPL and DTW quarterly. Table 2 in the Report contains monthly data for the 6 locations starting in August 1998 to December 2019. That's 21 years of monthly monitoring. An abundance of DNAPL presence/absence and DTW data has been collected at this Site already and the Site has been thoroughly characterized. Therefore, the sampling burden could be reduced significantly, especially because the last time DNAPL was detected in any of the monitoring locations was in October 2010, over 9 years ago.

I recommend that the 6 monitoring locations be monitored once every 2 years. The 6 locations are: MW-15, P-5, -6, -7, -10, -14.



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If the Facility wants to continue monitoring their wells for DNAPL and DTW, of course they may, but it appears that DNAPL is no longer in the shallow groundwater zone beneath the Facility.

2. PCBs Sampling: Table 6 in the Report shows total PCBs and turbidity data from 1994 to 2019, about 25 years of groundwater monitoring data. This data shows that there was (oil) product found in 5 wells/piezometers. It appears from the data that the product was removed from these wells over time. Since 2010, PCB (PCB-1242) has been consistently found in only one location (PZ-17), at a little over half a part per billion. As in the DNAPL data, there is an abundance of PCB data for this Site and the sampling burden could be reduced significantly also.

I recommend that PCB monitoring be continued at once every two years, and instead of the 10 locations currently sampled (Table 1), that 5 locations be sampled instead, these locations are: PZ-17, -18, -19, MW-14, MW-11B. These 5 locations are downgradient from what appears to be a former (oil) release area in the Mill Building or vicinity.

I offer these recommendations for your consideration. I do not know the environmental history of this Facility, but based on the data, I assume that there was a release of chemicals (oil with DNAPL and PCBs?) in the Mill Building or vicinity decades ago, and the groundwater contaminants have decreased because of contaminant removal actions, taken in the past. The question remains as to what happened to the DNAPL, i.e., where it went. I can conclude from the Report data that DNAPL is not showing up in shallow monitoring wells, but it could have moved deeper into the aquifer beneath the Facility.

A minor comment: EPA has a Risk Screening Level (RSL) for tap water for PCB-1248 of 7.8 parts per trillion, which is significantly smaller than the Act 2 level of 1.7 ug/l. The PCB level in PZ-17 (0.84 ug/l) is below the Act 2 level but above EPA's RSL level. EPA's RSL level is not a clean-up level, but only a 'screening level' for risk assessment purposes, based on health effects over a lifetime of consuming groundwater. The lab data shows that the limit of quantitation is 0.5 ug/l. Therefore, a practical clean-up level for PCB in groundwater is the Act 2 level. I assume that no one is using the groundwater as a drinking water source, therefore PCB levels below 1.7 ug/l for four consecutive sampling events would be a reasonable clean-up endpoint for PZ-17.

